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14 **UNITED STATES DISTRICT COURT**
15 **NORTHERN DISTRICT OF CALIFORNIA**
16 **SAN FRANCISCO HEADQUARTERS**

17 UNITED STATES OF AMERICA, *ex rel.*) Case No. C 12-1858 LB
18 GINA GIACCONNE and STATE OF)
19 CALIFORNIA *ex rel.* GINA GIACCONNE,) **REVISED STIPULATION OF**
20 Plaintiffs,) **DISMISSAL; [PROPOSED] ORDER**
21 v.)
22 BIOTRONIK, INC, et al.,)
23 Defendants.)

24 The United States of America, the State of California, and Gina Giaccone, as Relator,
25 through their undersigned counsel of record, hereby stipulate to dismiss the above-captioned
26 action without prejudice pursuant to Fed. R. Civ. R. 41(a)(1)(A). No other parties have appeared
27 in this action, and no answer or motion for summary judgment has been filed. All appearing
28 parties consent to the Court's jurisdiction.

STIPULATION OF DISMISSAL, No. C 12-1858 LB

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5 Dated: September 10, 2014
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Respectfully submitted,

STUART F. DELERY
Assistant Attorney General

MELINDA HAAG
United States Attorney
By: /s/ signature on file
SARA WINSLOW
Assistant United States Attorney

8 Dated: September 10, 2014
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By: /s/ signature on file
MICHAEL D. GRANSTON
JAMIE A. YAVELBERG
ADAM J. SCHWARTZ
Civil Division, U.S. Department of Justice
Attorneys for the United States of America

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13 Dated: September 8, 2014
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16

KAMALA HARRIS
Attorney General of the State of California
By: /s/ signature on file
EMMANUEL R. SALAZAR
Deputy Attorney General
Attorneys for the State of California

17 Dated: September 9, 2014
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19

REINER & SLAUGHTER, LLP
By: /s/ signature on file
Todd Slaughter
Attorneys for *Qui Tam* Plaintiff
Gina Giaccone

20 **[PROPOSED] ORDER**
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PURSUANT TO STIPULATION, IT IS HEREBY ORDERED that this action is
22 dismissed without prejudice. IT IS SO ORDERED.
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24 Dated: September 18, 2014
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27 LAUREL BEELER
28 United States Magistrate Judge